

## *Office of the Chapter 13 Standing Trustee*

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*Isabel C. Balboa, Chapter 13 Standing Trustee<sup>†</sup>*

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March 3, 2021

The Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court  
P.O. Box 2067  
Camden, New Jersey 08102

RE: CHAPTER 13 BANKRUPTCY  
CASE NO: 19-10330 (JNP)  
DEBTOR NAME: Edwin Cruz

Dear Judge Poslusny:

Please accept this letter as a limited objection to Debtor's Motion to Suspend Trustee Payments currently scheduled for March 23, 2021 at 11:00 a.m.

Debtor filed for Chapter 13 Bankruptcy protection on January 7, 2019. The Court entered an Order Confirming Debtor's plan on May 3, 2019, for \$1,200 paid to date, then \$597 for fifty-seven (57) months.

Debtor is seeking to suspend plan payments from March 2021 through August 2021 with payments resuming in September 2021. Debtor states in his certification in support of the motion that he has lost his job and is currently looking for new employment.

While the Trustee does not oppose a suspension of plan payments, it is the Trustee's position that a suspension of plan payments for six (6) months is unwarranted without more facts. The Trustee would not oppose a suspension of plan payments for three (3) months commencing with the payment due March 2021, with payments resuming June 2021.

Based on the foregoing, the Trustee respectfully requests Debtor be required to submit an amended proposed Order to the Judge's chambers to include the following language:

*The Chapter 13 Plan payments are hereby suspended for March 2021 through May 2021. Debtor shall resume plan payments commencing June 1, 2021 at \$529 for thirty-two (32) months with \$14,334 paid to date. Debtor shall submit updated income and amend Schedules I and J, no later than May 30, 2021.*

As always, the Court is welcome to contact the Trustee with any questions or concerns.

Respectfully submitted,

OFFICE OF THE CHAPTER 13  
STANDING TRUSTEE

*/s/ Jennifer R. Gorchow*  
Jennifer R. Gorchow, Esquire  
Attorney for Isabel C. Balboa  
Chapter 13 Standing Trustee

JRG/kt

c: Seymour Wasserstrum, Esquire (Via ECF/CM)  
Edwin Cruz (Via regular mail)